



August 17, 2006

Reply to Attn of:

LS01(DMW)

MEMORANDUM FOR RECORD

FROM: LS01/James R. Frees

SUBJECT: Approval for MSFC Employees with Senior Institutional or Project Responsibilities to Attend a Pre-launch Reception Co-sponsored by NASA Marshall Space Flight Center, ATK Launch Systems, Lockheed Martin Michoud Space Systems, and Pratt-Whitney Rocketdyne

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

Certain MSFC employees with senior institutional or project responsibilities have been invited to attend a pre-launch reception co-sponsored by NASA Marshall Space Flight Center, ATK Launch Systems, Lockheed Martin Michoud Space Systems, and Pratt-Whitney Rocketdyne at the Doubletree Hotel Cocoa Beach, Florida, on or about Saturday, August 26, 2006. This event is to be held in conjunction with the launch of STS-115, at the Kennedy Space Center.

This event will be a widely-attended gathering of aerospace industry representatives, Federal and State officials and other community leaders. The reception is valued at \$20 per person and approximately 150 individuals have been invited to attend. The reception is fully funded by contributions from the contractors with MSFC Office of Protocol providing oversight and management of the event. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

ATK Launch Systems, Lockheed Martin Michoud Space Systems, and Pratt-Whitney Rocketdyne are contractor companies that are currently involved in the Space Shuttle program, and other significant contractual matters relating to NASA. Some MSFC personnel invited to attend this event presently, or may in the near future, have extensive involvement in matters relating to ATK Launch Systems, Lockheed Martin Michoud Space Systems, or Pratt-Whitney Rocketdyne's business interests. These personnel include MSFC Center Director, MSFC Deputy Center Director, MSFC Associate Director, Director, MSFC Office of Procurement, Director, MSFC Chief Financial Office, Director, MSFC Office of Center Operations, Director, MSFC Engineering Directorate, Deputy Director, MSFC Engineering Directorate, Acting Director, Safety &

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Mission Assurance Directorate, Manager, Shuttle Propulsion Office, Deputy Manager, Shuttle Propulsion Office, Supervisor, Space Shuttle Main Engine Project, Supervisor, Reusable Solid Rocket Motor Project, Supervisor, External Tank Project, Supervisor, Propulsion Systems Engineering & Integration Office, Supervisor, Exploration & Space Operations, and Manager and Deputy Manager, Marshall Resident Office at Kennedy Space Center. These personnel are similarly situated in that they each have senior institutional or project responsibilities that could significantly influence current or future ATK Launch Systems, Lockheed Martin Michoud Space Systems, or Pratt-Whitney Rocketdyne contracts.

I have determined that free attendance of these senior institutional and project leaders at the pre-launch reception is in the interests of the agency because it will further agency programs and operations. The attendance of these senior NASA employees at the event will help to raise NASA's profile with national, state, and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information about its programs.

The total per-person cost for the event is estimated at \$20. Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the modest market value of the event, I have determined that the value to the agency in having these senior institutional and project leaders attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA employees in the positions identified above may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. Free attendance by employees whose duties do not affect the industry co-sponsors is addressed in a separate determination.

Questions about this determination may be addressed to Devinti M. Williams at 256-544-0012.


James R. Frees
Acting Chief Counsel